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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT TACOMA

11 In Re:

12 DMCA SUBPOENA TO CLOUDFLARE,  
13 INC.,

14 Service Provider.

Case No.: 3:20-mc-05016-BHS

DECLARATION IN SUPPORT OF  
REQUEST FOR DMCA SUBPOENA TO  
CLOUDFLARE, INC.

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DECLARATION IN SUPPORT OF  
REQUEST FOR DMCA SUBPOENA  
TO CLOUDFLARE, INC. - 1

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98402  
(253) 383-4500 - (253) 383-4501 (fax)

1 I, ANIS BABA, hereby declare as follows:

2 1. I am a Director of MG Premium Ltd (hereinafter, "MG") and am authorized to act  
3 on its behalf. I have personal knowledge of the facts contained herein and, if called upon to do  
4 so, could and would testify competently thereto.

5 2. I submit this declaration in support of MG's request for issuance of a Subpoena  
6 by the Clerk of this Court, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17  
7 U.S.C. § 512(h) to Cloudflare, Inc. ("Cloudflare"), relating to the posting of MG's copyrighted  
8 material on the domain, xmoviesforyou.video, a webpage hosted by Cloudflare.

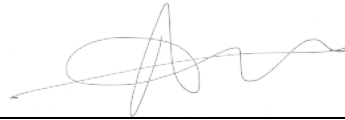
9 3. I have personal knowledge of the copyrights owned by MG and the ongoing  
10 infringements of those copyrights that occur on the internet. I also have personal knowledge of  
11 the countless instances that MG's copyrighted works have been posted without MG authorization  
12 to xmoviesforyou.video.

13 4. On March 18, 2020, authorized agent for MG Adam D'Ambrosio issued and  
14 served identical copyright infringement notifications on Cloudflare's DMCA Agent relating to  
15 posts on xmoviesforyou.video. Pursuant to Section 512(c)(3)(A), the notifications were properly  
16 signed by MG's agent, identified the copyrighted material being infringed, set forth a listing of  
17 the 2 URLs containing posts of infringing material, confirmed that such use of MG's copyrighted  
18 works was not authorized by MG, and gave contact information such that the DMCA Agent  
19 could reach MG's Agent with questions. A true and correct copy of the March 18, 2020  
20 notification is attached as Exhibit A.

21 5. The purpose of the DMCA Subpoena is to obtain information sufficient to  
22 identify alleged infringers who, without authorization from MG, posted material to the web page  
23 xmoviesforyou.video, which infringed copyrights held by MG. The information received as a  
24 result of the Subpoena will only be used by MG to protect its rights under Title 17 of the United  
25 States Code.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 DATED this 24<sup>th</sup> day of March 2020, at Nicosia, Cyprus.

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6  
7 ANIS BABA  
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# **Exhibit A**

**Copies of Notifications Issued Pursuant to  
17 U.S.C. § 512(c)(3) to  
Registered DMCA Agent for  
Service Provider Cloudflare, Inc.**

**Jason Tucker**

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**From:** DMCA <dmca@brazzers.com>  
**Sent:** Wednesday, March 18, 2020 7:49 AM  
**To:** 'abuse@cloudflare.com'; 'abuse@netim.net'  
**Subject:** Notice of Copyright Infringement xmoviesforyou.video (#SDXM03182020BZ)

Whom It May Concern,

DMCA Copyright Infringement Notice

1. Infringed Work: ([www.brazzers.com](http://www.brazzers.com))

2. Search Query:

<https://xmoviesforyou.video/2020/03/brazzersexextra-monique-alexander-wrong-side-of-the-bed.html>

<https://xmoviesforyou.video/2020/03/brazzersexextra-cherie-deville-cumplimentary-training-session.html>

I, the undersigned, do solemnly and sincerely declare and CERTIFY UNDER

PENALTY OF PERJURY that:

1. I am an agent authorized to act on behalf of the owner, being named "MG Premium Ltd", of exclusive intellectual property rights that are allegedly infringed.
2. I have a good faith belief that the use of the materials in the manner complained of is not authorized by the copyright owner, its agent, or the law.
3. To the best of my knowledge the information contained within this notice is accurate and correct.
4. I acknowledge that there may be adverse legal consequences for making false or bad faith allegations of copyright infringement by using this process

Thank you very much

Signed,

Adam D'Ambrosio— DMCA Agent



An authorized representative for and on behalf of

**MG Premium Ltd**

[REDACTED]

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a series of loops and a long horizontal stroke.

Block 1 Dali Industrial Zone,

Cyprus 2540

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mentioned above, you are hereby advised that any use, copying or reproduction of this document is strictly forbidden. Please advise us of this error

and destroy this message.